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# MEMO ENDORSED

February 21, 2025

**VIA ECF**

The Honorable Andrew L. Carter Jr., U.S.D.J.  
United States District Judge  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

USDC SDNY  
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DATE FILED: 03/14/2025

**Re: United States of America v. Yu, et al., 20-cr-00648-ALC**

Dear Judge Carter:

We represent defendant Valeria Ruth Hacohen (“Hacohen”) in the above-referenced matter. We now write to this Court to request a modification of Ms. Hacohen’s bail conditions permitting Ms. Hacohen to travel to Israel so she could take her children to Israel as part of her divorce agreement with her former husband so they can celebrate the Jewish Holidays with their father. (Dkt. 4).

Although the current situation in the Middle East has made travel difficult, Ms Hacohen was able to secure airline tickets for her and her family whereby she would depart from the United States on April 10, 2025 and return on April 29, 2025. Thus, we would request permission from the Court to modify bail conditions to permit her to travel April 10, 2025 to April 29, 2025.

We notified the United States Attorney’s Office for the Southern District of New York and United States Pretrial Services on or about February 13, 2025 of this request. I was informed by the United States Pretrial Services that it takes no position on the request, and I have not heard from the United States Attorney’s Office for the Southern District of New York. Although we have not heard from the Government, we needed to submit this request to the Court given the time considerations involved in asking for the bail modification concerning travel and the proposed travel dates. We thank the Court for its consideration of this matter.

Respectfully submitted,  
  
 Ernest Edward Badway

cc: All Counsel (via ECF)

The application is **GRANTED**.  
So Ordered.

March 14, 2025

New York, NY

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